

1 **SOE**

2 Brigid M. Higgins, Esq.

3 Nevada Bar No. 5990

4 J. Rusty Graf, Esq.

5 Nevada Bar No. 6322

6 **BLACK & WADHAMS**

7 10777 W Twain Avenue, 3<sup>rd</sup> Floor

8 Las Vegas, Nevada 89135

9 Telephone: (702) 869-8801

10 Facsimile: (702) 869-2669

11 Email: [bhiggins@blackwadhams.law](mailto:bhiggins@blackwadhams.law)

12 Email: [rgraf@blackwadhams.law](mailto:rgraf@blackwadhams.law)

13 *Attorneys for Defendant Shinjuku LLC*

14 **UNITED STATES DISTRICT COURT**  
15 **FOR THE DISTRICT OF NEVADA**

16 JOHN MEGGS,

17 Plaintiff,

18 vs.

19 R & G HOLDINGS, LLC;  
20 LE PRIVE HOSPITALITY LLC; and  
21 SHINJUKU LLC,

22 Defendants.

23 Case No.: 2:23-cv-1051-APG-BNW

24 **DEFENDANT SHINJUKU, LLC's  
25 STIPULATION AND ORDER TO  
26 EXTEND TIME TO RESPOND TO  
27 PLAINTIFF'S COMPLAINT**

28 Defendant, SHINJUKU, LLC, by and through their counsel of record, Brigid M. Higgins, Esq. of the law firm of BLACK & WADHAMS, and Plaintiff JOHN MEGGS, by and through his counsel of record, ROBERT P. SPRETNACK, ESQ. of the LAW OFFICES OF ROBERT P. SPRETNACK, and ANTHONY PEREZ, ESQ. of the LAW FIRM OF GARCIA-MENOCAL & PEREZ P.L. (*Pro Hac Vice pending*), stipulate as follows:

10777 W. Twain Avenue, 3<sup>rd</sup> Floor  
10 Las Vegas, Nevada 89135  
(702) 869-8801 FAX: (702) 869-2669

11 **Defendant, SHINJUKU, LLC's response to Plaintiff's Complaint is presently due on**  
12 **August 23, 2023. The Defendant's are requesting additional time to investigate the claims made**  
13 **in the Complaint and defenses thereto. The parties stipulate that Defendant, SHINJUKU, LLC**  
14 **may have an extension of time to file a responsive pleading to Plaintiff's Complaint to and**  
15 **including September 6, 2023.**

16 *///*

1 DATED this 21st day of August, 2023  
2

3 **BLACK & WADHAMS**  
4

5 By: /s/Brigid M. Higgins, Esq.  
6 Brigid M. Higgins, Esq.  
7 Nevada Bar No. 5990  
8 J. Rusty Graf, Esq.  
9 Nevada Bar No. 6322  
10 10777 W Twain Avenue, 3<sup>rd</sup> Floor  
11 Las Vegas, Nevada 89135  
12 Telephone: (702) 869-8801  
13 Facsimile: (702) 869-2669  
14 Email: [bhiggins@blackwadhams.law](mailto:bhiggins@blackwadhams.law)  
15 Email: [rgraf@blackwadhams.law](mailto:rgraf@blackwadhams.law)  
16 *Attorneys for Defendant Shinjuku LLC*  
17

18 **THE LAW OFFICES OF**  
19 **ROBERT P. SPRETNAK**  
20

21 By: /s/ Robert P. Spretnak, Esq.  
22 Robert P. Spretnak, Esq.  
23 Nevada Bar No. 5135  
24 8275 South Eastern Avenue Suite 200  
25 Las Vegas, Nevada 89123  
26 Telephone: (702) 494-4900  
27 Facsimile (702) 938-1055  
28 Email: [bob@spretnak.com](mailto:bob@spretnak.com)

18 **THE LAW FIRM OF GARCIA-**  
19 **MENOCAL & PEREZ, P.L.**  
20

21 Anthony Perez, Esq. (*pro hac pending*)  
22 3550 Sevilla Avenue, Suite 200  
23 Coral Gables, Florida 33134  
24 Telephone: (305) 553-3464  
25 Facsimile: (305) 553-3031  
26 Email: [ajperez@lawgmp.com](mailto:ajperez@lawgmp.com)  
27 *Attorneys for Plaintiff John Meggs*  
28

24 **ORDER**  
25

26 **IT IS SO ORDERED**

27 **DATED:** 11:00 am, August 23, 2023  
28

  
27 BRENDA WEKSLER  
28 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

HEREBY CERTIFY that on the 22<sup>nd</sup> day of AUGUST 2023, I electronically filed the DEFENDANT SHINJUKU LLC'S **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** to all parties on file with the CM/ECF System.

By /s/ Monica Davis  
An Employee of  
BLACK & WADHAMS

**BLACK & WADHAMS**  
10777 W. Twain Avenue, 3<sup>rd</sup> Floor  
Las Vegas, Nevada 89135